

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA

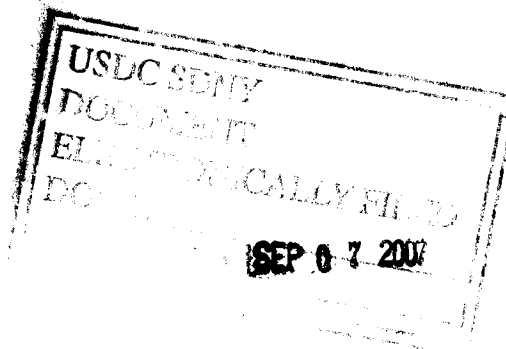
- v. -

MICHAEL LEE,
a/k/a "Michael Li," and
BERNARD HUI,

Defendants.
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Scaled
INDICTMENT

SI 07 Cr. *846*



COUNT ONE

The Grand Jury charges:

1. From at least in or about February 2007, up to and including on or about July 9, 2007, in the Southern District of New York and elsewhere, MICHAEL LEE, a/k/a "Michael Li," and BERNARD HUI, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Section 1341 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that MICHAEL LEE, a/k/a "Michael Li," and BERNARD HUI, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, to wit, a scheme to obtain automobile insurance for a fleet of commuter vans at reduced

rates by, among other things, submitting and causing to be submitted to Lincoln General Insurance Company documents that falsely represented, among other things, that LEE's business, the principal place of garaging LEE's vehicles and the location in which the vehicles primarily operated were all outside of New York City, for the purpose of executing such scheme and artifice and attempting so to do, unlawfully, willfully and knowingly would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and would and did take and receive therefrom, such matters and things, and would and did knowingly cause to be delivered by mail according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, such matters and things, in violation of Title 18, United States Code, Section 1341.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about February 15, 2007, MICHAEL LEE, the defendant, submitted an application for automobile insurance through the New York State Automobile Insurance Plan assigned risk pool, which application contained false and misleading

information .

b. In or about March 2007, LEE caused a letter to be sent by the Postal Service from an insurance broker in New York, New York to the underwriting department of Lincoln General Insurance Company.

c. On or about May 16, 2007, LEE and BERNARD HUI, the defendants, met with an insurance investigator in Wappingers Falls, New York.

(Title 18, United States Code, Section 1349.)

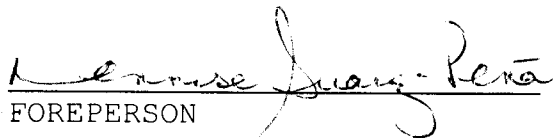
COUNT TWO


The Grand Jury further charges:

4. From at least in or about February 2007, up to and including on or about July 9, 2007, in the Southern District of New York and elsewhere, MICHAEL LEE, a/k/a "Michael Li," and BERNARD HUI, the defendants, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, to wit, a scheme to obtain automobile insurance for a fleet of commuter vans at reduced rates by, among other things, submitting and causing to be submitted to Lincoln General Insurance Company documents that falsely represented, among other things, that LEE's business, the principal place of garaging LEE's vehicles and the location in which the vehicles primarily operated were all outside of New

York City, for the purpose of executing such scheme and artifice and attempting so to do, unlawfully, willfully and knowingly would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and would and did take and receive therefrom, such matters and things, and would and did knowingly cause to be delivered by mail according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, such matters and things, to wit, LEE and BERNARD HUI, the defendants, caused letters to be sent by the Postal Service in connection with insurance coverage for commuter vans, including a letter in or about March 2007 from an insurance broker in New York, New York to the underwriting department of Lincoln General Insurance Company.

(Title 18, United States Code, Section 1341.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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- v. -

MICHAEL LEE,
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BERNARD HUI,

Defendants.

INDICTMENT

S1 07 Cr.

(Title 18, United States Code,
Sections 1341, 1349.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL

Dennise Suarez-Pena
Foreperson.
Dennise Suarez-Pena
